



September 14, 2017

Reference No. 030409

Ms. Leslie Blake
Remedial Project Manager
United States Environmental
Protection Agency
Region 5
Ralph Metcalfe Federal Building
77 West Jackson
Chicago, Illinois 60604-3590

Dear Leslie:

Re: **Proposal for Monitoring Well Replacement Locations and Depths
Rexnord
2400 Curtiss Street
Downers Grove, Illinois**

In order to address potential concerns regarding the replacement of monitoring wells on Rexnord property, we have prepared a proposed well replacement plan for U.S.EPA's review. The attached Table 1 summarizes the plan, including rationale for replacement or non-replacement. The table includes the survey coordinates and well screen intervals for the existing wells.

As you know, Rexnord is planning to abandon all 22 wells so that there is no risk of damage to wells during construction activity. With regard to a plan to replace wells, it is important to recognize that the overburden groundwater recharges the bedrock aquifer and that the bedrock groundwater moves in a southerly direction. As such, GHD recommends that the replacement wells focus both on former Overburden wells with VOCs and on bedrock groundwater along the downgradient (south) boundary of the facility.

GHD is recommending that OV-11 be replaced to provide ongoing monitoring capabilities of past VOCs above MCL in this area. Also, GHD is recommending that OV-51, MW-276I and BD-8I be replaced to allow ongoing monitoring of VOCs detected at OV-51 and MW-276.

GHD is recommending that 4 bedrock wells be installed across the south boundary of the facility as replacements for RMW-2D, RMW-3D, RMW-5D and BD-8D. This will re-establish a line of bedrock wells downgradient of VOCs detected above MCLs to the north.

Wells proposed for replacement will be installed to the same depths as those they are replacing. Well locations will be as close to the existing locations as practicable, unless an alternate location is proposed in Table 1.

As you are aware, the well abandonments must be rescheduled as soon as possible so that the construction schedule is not significantly disrupted. Rexnord would like to proceed no later than



September 18, 2017. Thanks again for your prompt attention to this matter. Please contact me if you have any questions.

Sincerely,

GHD

A handwritten signature in black ink, appearing to read "Ron Frehner". The signature is fluid and cursive, with the first name "Ron" being more legible than the last name "Frehner".

Ron Frehner

CA/md/6

cc: Tom Frost, Rexnord
Kelli Taffora, Rexnord
Amy Gahala, USGS
Ron Frehner, GHD
Mark Bilut, McDermott, Will and Emery

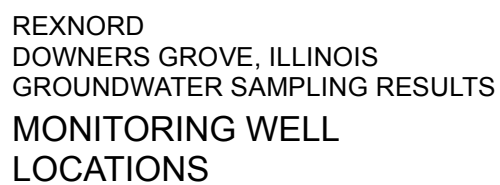


FIGURE 1

Table 1
Monitoring Well Replacement Proposal
Rexnord
2400 Curtiss Street
Downers Grove, Illinois

Drift Wells	Installed by	Installation Date	GPS Coordinates		TOC Elevation (ft. AMSL)	Screened Interval (ft. bgs)	Formation at Bottom of Well	Groundwater Classification	Proposed for Replacement	Rationale
			Lat. (deg.)	Long. (deg.)						
BD-1 I	USEPA	05/17/02	41.794271	-88.042922	696.56	27 - 37	Overburden	Alluvial Aquifer	No	Is in middle of new Phase II building. Very low concentrations of 111TCA. No detections above MCLs.
BD-2 I	USEPA	05/20/02	41.794210	-88.044322	701.78	30 - 40	Overburden	Alluvial Aquifer	No	Is in middle of new Phase I Building. Low concentrations of PCE, not above MCL.
BD-3 I	USEPA	05/09/02	41.793417	-88.044395	688.00	30 - 35	Overburden	Alluvial Aquifer	No	Overburden well at downgradient Site boundary. No detections of VOCs.
BD-8 I	USEPA	05/21/02	41.792808	-88.042042	689.86	35 - 45	Overburden	Alluvial Aquifer	Yes	Overburden well potentially downgradient from OV-5I and MW-276I, which contain VOCs above the MCLs.
OV-1 I	USEPA	05/29/02	41.794993	-88.044689	702.56	48 - 53	Overburden	Alluvial Aquifer	Yes	Overburden well which is near a previously identified potential source area and has historically exhibited VOC concentrations above the MCL.
OV-4 I	USEPA	06/03/02	41.793269	-88.043369	691.04	48 - 58	Overburden	Alluvial Aquifer	No	Overburden well at downgradient Site boundary. Very low detections of 11DCA. Nothing above MCL.
OV-5 I	USEPA	05/23/02	41.793926	-88.042062	694.56	43 - 48	Overburden	Alluvial Aquifer	Yes	Overburden well near east property boundary. TCE above MCL.
OV-9 I	USEPA	05/30/02	41.794272	-88.043473	703.04	32 - 42	Overburden	Alluvial Aquifer	No	Is in middle of new Phase II building. Very low concentrations of 111TCA. No detections above MCLs.
RMW-1 I	Rexnord	01/11/06	41.793708	-88.045706	691.82	39 - 44	Overburden	-	No	Overburden well at downgradient Site boundary. No detections of VOCs.
MW276 I	USEPA	01/31/07	41.793363	-88.042022	695.03	35 - 45	Overburden	Alluvial Aquifer	Yes	Overburden well near east property boundary. Concentrations of TCE above MCL.
MW277 I	USEPA	01/31/07	41.795334	-88.045151	-	40 - 50	Overburden	Alluvial Aquifer	No	Upgradient overburden well in middle of proposed storm water pond.
MW278 I	USEPA	02/01/07	41.795002	-88.044790	701.73	33 - 43	Overburden	Alluvial Aquifer	No	Not needed because replacement for OV-5I is at same location. No detections of VOCs.
MW279 I	USEPA	02/02/07	41.794269	-88.043808	703.08	30 - 40	Overburden	Alluvial Aquifer	No	In middle of new Phase I and II buildings. No VOCs detected.
MW280 I	USEPA	02/01/07	41.794249	-88.044608	701.42	35 - 45	Overburden	Alluvial Aquifer	No	Is in middle of new Phase I building. Very low concentration of PCE in 2007. No detections above MCLs.

Table 1

Monitoring Well Replacement Proposal
Rexnord
2400 Curtiss Street
Downers Grove, Illinois

	Installed by	Installation Date	GPS Coordinates		TOC Elevation (ft. AMSL)	Screened Interval (ft. bgs)	Formation at Bottom of Well	Groundwater Classification	Proposed for Replacement	Rationale
			Lat. (deg.)	Long. (deg.)						
Bedrock Wells										
BD-1 D	USEPA	05/17/02	41.794	-88.043	696.25	60 - 70	Shallow Bedrock	Bedrock Aquifer	No	In middle of new Phase II building. No VOCs detected.
BD-2 D	USEPA	05/20/02	41.794	-88.044	701.78	67 - 77	Shallow Bedrock	Bedrock Aquifer	No	Is in middle of new Phase I Building. Low concentrations of PCE and TCE, not above MCL. Bedrock wells proposed downgradient of BD-2D
BD-8 D	USEPA	05/21/02	41.793	-88.042	690.00	68.5 - 78.5	Shallow Bedrock	Bedrock Aquifer	Yes	Bedrock well potentially downgradient from OV-5I and MW-276I, which exhibit concentrations above MCLs.
RMW-1 D	Rexnord	01/11/06	41.794	-88.046	691.43	62 - 67	Shallow Bedrock	Bedrock Aquifer	No	Bedrock well on far southwest corner of property. Historically concentrations of PCE less than 1 ug/L. Nothing above MCLs.
RMW-2 D	Rexnord	01/12/06	41.793	-88.044	688.63	55 - 60	Shallow Bedrock	Bedrock Aquifer	Yes	Monitors upper bedrock at downgradient property boundary. No concentrations above MCL.
RMW-3 D	Rexnord	01/13/06	41.793	-88.044	688.49	64 - 69	Shallow Bedrock	Bedrock Aquifer	Yes	Monitors upper bedrock at downgradient property boundary. No concentrations above MCL.
RMW-4 D	Rexnord	01/17/06	41.793	-88.043	690.76	75 - 80	Shallow Bedrock	Bedrock Aquifer	No	Monitors upper bedrock at downgradient property boundary, but is close to RMW-3D. No VOCs ever detected.
RMW-5 D	Rexnord	01/19/06	41.793	-88.042	690.54	70 - 75	Shallow Bedrock	Bedrock Aquifer	Yes	Monitors upper bedrock at downgradient property boundary. No detections reported for VOCs. Would be moved slightly to the west for better coverage of the south boundary.

Notes

- Information not available
- AMSL Above Mean Sea Level
- bgs Below Ground Surface
- TOC Top of Casing